

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

CHICKEN SOUP FOR THE SOUL  
ENTERTAINMENT, INC., *et al.*,

Debtors.

Chapter 7

Case No. 24-11442 (MFW)

(Jointly Administered)

GEORGE L. MILLER, CHAPTER 7 TRUSTEE,

Plaintiff.

v.

WILLIAM J. ROUHANA, JR., AMY L. NEWMARK,  
CHRISTOPHER MITCHELL, FRED M. COHEN,  
COSMO DENICOLA, MARTIN POMPADUR,  
CHRISTINA WEISS LURIE, DIANA WILKIN,  
VIKRAM SOMAYA, JASON MEIER, AMANDA R.  
EDWARDS, CHICKEN SOUP FOR THE SOUL  
PRODUCTIONS, LLC, CHICKEN SOUP FOR THE  
SOUL, LLC, CHICKEN SOUP FOR THE SOUL  
HOLDINGS, LLC,

Defendants.

Adv. Proc. No. 25-ap-50399 (MFW)

[Related Docket Nos. 1, 31, 33, 34, 35, 36,  
37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47,  
51, 52, 55, 56, 57, 58, 59, 60, 61, 62, 64,  
65, 66]

**STATUS REPORT REGARDING TRUSTEE'S COMPLAINT FOR  
(I) BREACH OF FIDUCIARY DUTY; (II) AIDING AND ABETTING BREACH  
OF FIDUCIARY DUTY; (III) AVOIDANCE OF FRAUDULENT TRANSFERS;  
(IV) RECOVERY OF ILLEGAL DIVIDENDS; (V) DAMAGES FOR NONPAYMENT  
OF EMPLOYEE WAGES, BENEFITS, AND PAYROLL TAXES; (VI) EQUITABLE  
SUBORDINATION; AND (VII) DISALLOWANCE OF CLAIMS;  
AND MOTIONS TO DISMISS ADVERSARY PROCEEDING FILED BY DEFENDANTS**

George L. Miller, the duly appointed chapter 7 trustee of the above-captioned Debtors' estates (the "Trustee"), on behalf of Chicken Soup for the Soul Entertainment, Inc., and its related debtors (the "Company"), and as Plaintiff in the above-captioned adversary proceeding, hereby submits this *Status Report Regarding Trustee's Complaint for (I) Breach of Fiduciary Duty;*

(II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Nonpayment of Employee Wages, Benefits, and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims; and Motions To Dismiss Adversary Proceeding Filed By Defendants.

## **STATUS REPORT**

### **The Trustee's Complaint**

1. On March 12, 2025, the Trustee filed the *Complaint for (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Non-Payment of Employee Wages, Benefits and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims* [D.I. 1] (the “Complaint”) against William J. Rouhana, Jr., Amy L. Newmark, Christopher Mitchell, Fred M. Cohen, Cosmo DeNicola, Martin Pompadur, Christina Weiss Lurie, Diana Wilkin, Vikram Somaya, Jason Meier, Amanda R. Edwards, Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, Chicken Soup for the Soul Holdings, LLC (the “Defendants”).

2. The Defendants are the following:

### **The Director & Officer Defendants**

- William J. Rouhana, Jr. Mr. Rouhana served as the Chairman of the Board of Directors of the Company (the “Board”), the Chief Executive Officer of the Company, controlled the Company and its subsidiaries (including all of the Debtors), and controls each of Defendants Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, Chicken Soup for the Soul Holdings, LLC (defined as the “CSS Entities”). Mr. Rouhana is the husband of Defendant Amy L. Newmark.
- Amy L. Newmark. Ms. Newmark served as a member of the Board. Newmark also served as Senior Brand Advisor to the Company pursuant to a Management Agreement between the Company and Chicken Soup for the Soul, LLC (defined as “CSS”) and, with Mr. Rouhana, owns the CSS Entities. Ms. Newmark is the wife of Mr. Rouhana.

- Christopher Mitchell. Since June 2021, Mr. Mitchell served as a member of the Board. Mitchell also served as the Company's Chief Financial Officer for the period from January 1, 2019 through November 2022 and, since January 1, 2019, has served as the Chief Financial Officer of CSS.
- Cosmo DeNicola. Since June 2019, Mr. DeNicola served as a member of the Company's Board.
- Fred M. Cohen. Since June 2016, Mr. Cohen served as a member of the Company's Board.
- Christina Weiss Lurie. Since June 2016, Mr. Lurie served as a member of the Company's Board.
- Diana Wilkin. Since June 2016, Mr. Wilkin served as a member of the Company's Board.
- Vikram Somaya. Since October 2021, Mr. Somaya served as a member of the Company's Board.
- Martin Pompadur. Since June 2019, Mr. Pompadur served as a member of the Company's Board.
- Jason Meier. Since November 2022, Mr. Meier served as the Chief Financial Officer and Principal Accounting Officer of the Company. Prior to this time, commencing September 2021, Mr. Meier served as Executive Vice President, Finance and Chief Accounting Office of the Company.
- Amanda R. Edwards. Since 2017, Ms. Edwards served Chief of Staff for Mr. Rouhana. In addition, for the period May 2022 through December 2023, Ms. Edwards served as the Company's Senior Vice President and Chief of Staff and, for the period January 2024 to October 2024, Ms. Edwards served as the Company's Executive Vice President of Operations.

#### The CSS Entity Defendants

- Chicken Soup for the Soul Productions, LLC (“CSSP”) is the parent and controlling stockholder of the Company, owning approximately 100% of the Company's Class B common stock (representing an ownership of 36.7% of the total outstanding common stock and 85% control of the voting power of the Company). CSSP is controlled by Mr. Rouhana.
- Chicken Soup for the Soul, LLC (“CSS”) owns 100% of CSSP. CSS is controlled by Mr. Rouhana.

- Chicken Soup for the Soul Holdings, LLC (“CSS Holdings”) owns 100% of CSS. CSS Holdings is controlled by Mr. Rouhana.

**Defendants’ Motions to Dismiss the Trustee’s Complaint**

3. On July 11, 2025, Defendants Fred M. Cohen, Cosmo DiNicola, Christina Weiss Lurie, Martin Pompadur, Vikram Somaya, and Diana Wilkin filed a *Motion to Dismiss Adversary Proceeding* [D.I. 31] and *Independent Directors’ Opening Brief in Support of Motion to Dismiss Adversary Complaint* [D.I. 35].

4. On July 11, 2025, Defendant Amanda R. Edwards filed a *Motion to Dismiss Case* [D.I. 33] and *Opening Brief in Support of Motion to Dismiss* [D.I. 34].

5. On July 11, 2025, Defendant William J. Rouhana, Jr. filed a *Motion to Dismiss Adversary Proceeding* [D.I. 36] and *Memorandum in Support of Motion to Dismiss Complaint* [D.I. 37].

6. On July 11, 2025, Defendant Amy L. Newmark filed a *Motion to Dismiss Adversary Proceeding* [D.I. 38] and *Memorandum in Support of Motion to Dismiss Complaint* [D.I. 39].

7. On July 11, 2025, Defendants Chicken Soup for the Soul Holdings, LLC, Chicken Soup for the Soul Productions, LLC, and Chicken Soup for the Soul, LLC filed a *Motion to Dismiss Adversary Proceeding* [D.I. 40] and *Memorandum of Law in Support of Motion to Dismiss Complaint* [D.I. 41].

8. On July 11, 2025, Defendants William J. Rouhana, Jr., Amy L. Newmark, Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, and Chicken Soup for the Soul Holdings, LLC filed an *Appendix of Exhibits in Support of Defendants William J. Rouhana, Jr., Amy L. Newmark, Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul,*

*LLC, and Chicken Soup for the Soul Holdings, LLC (“Movants”) Respective Memorandum of Law in Support of Motion to Dismiss Plaintiff’s Complaint [D.I. 42].*

9. On July 11, 2025, Defendant Jason Meier filed a *Motion to Dismiss Adversary Proceeding* [D.I. 43] and *Opening Brief in Support of Motion to Dismiss Adversary Complaint and Joinder* [D.I. 44].

10. On July 11, 2025, Defendant Christopher Mitchell filed a *Motion to Dismiss the Complaint* [D.I. 45], *Brief in Support of Christopher Mitchell’s Motion to Dismiss the Complaint* [D.I. 46], and *Declaration of Douglas P. Baumstein in Support of Motion to Dismiss the Complaint* [D.I. 47].

**Stipulated Scheduling Order re Briefing on Motions to Dismiss**

11. On August 4, 2025, the Court entered an *Order Approving Stipulated Scheduling Order* approving the briefing schedule for the filing of responses and replies in connection with the Motions to Dismiss [D.I. 50].

**Trustee’s Responsive Briefs in Opposition to the Motions to Dismiss**

12. On August 29, 2025, the Trustee filed the *Trustee’s Omnibus Responsive Brief I in Opposition to Defendants’ Motions to Dismiss the Trustee’s Complaint For (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Nonpayment of Employee Wages, Benefits, and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims* [D.I. 51].

13. On August 29, 2025, the Trustee filed the *Trustee’s Omnibus Responsive Brief II in Opposition to Defendants’ Motions to Dismiss the Trustee’s Complaint For (I) Breach of Fiduciary Duty; (II) Aiding and Abetting Breach of Fiduciary Duty; (III) Avoidance of Fraudulent*

*Transfers; (IV) Recovery of Illegal Dividends; (V) Damages for Nonpayment of Employee Wages, Benefits, and Payroll Taxes; (VI) Equitable Subordination; and (VII) Disallowance of Claims* [D.I. 52].

**Defendants' Reply Briefs**

14. On September 26, 2025, Defendant Amanda R. Edwards filed a *Reply Brief in Further Support of Defendant Amanda Edwards' Motion to Dismiss Plaintiff's Complaint* [D.I. 55].

15. On September 26, 2025, Defendants Fred M. Cohen, Cosmo DiNicola, Christina Weiss Lurie, Martin Pompadur, Vikram Somaya, and Diana Wilkin filed the *Independent Directors' Reply Brief in Support of Motion to Dismiss Adversary Complaint* [D.I. 56].

16. On September 26, 2025, Defendant Jason Meier filed a *Reply Brief in Support of His Motion to Dismiss Adversary Complaint and Joinder* [D.I. 57].

17. On September 26, 2025, Defendants Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, and Chicken Soup for the Soul Holdings, LLC filed *Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, and Chicken Soup for the Soul Holdings, LLC's Reply in Support of Motion to Dismiss Complaint* [D.I. 59].

18. On September 26, 2025, Defendants William J. Rouhana, Jr. and Amy L. Newmark filed *William J. Rouhana, Jr.'s and Amy L. Newmark's Reply in Support of Motions to Dismiss* [D.I. 60].

19. On September 26, 2025, Defendant Christopher Mitchell filed *Christopher Mitchell's Reply Brief in Support of His Motion to Dismiss the Complaint* [D.I. 61] and *Supplemental Declaration of Douglas P. Baumstein in Further Support of Christopher Mitchell's Motion to Dismiss the Complaint* [D.I. 62].

**Defendants' Requests for Oral Argument**

20. On September 26, 2025, Defendants Fred M. Cohen, Cosmo DiNicola, Christina Weiss Lurie, Martin Pompadur, Vikram Somaya, and Diana Wilkin filed a *Request for Oral Argument* [D.I. 58].

21. On September 29, 2025, Defendant Amanda R. Edwards filed a *Request for Oral Argument* [D.I. 64].

22. On September 30, 2025, Defendants Chicken Soup for the Soul Holdings, LLC, Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, Jason Meier, Christopher Mitchell, Amy L. Newmark, and William J. Rouhana, Jr. filed a *Request for Oral Argument* [D.I. 65].

23. The Trustee has not requested oral argument on the Motions to Dismiss.

**Notice of Completion of Briefing**

24. On September 30, 2025, Chicken Soup for the Soul Holdings, LLC, Chicken Soup for the Soul Productions, LLC, Chicken Soup for the Soul, LLC, William J. Rouhana, Jr., Amy L. Newmark, Christopher Mitchell, Amanda R. Edwards, Jason Meier, Fred M. Cohen, Cosmo DiNicola, Christina Weiss Lurie, Martin Pompadur, Vikram Somaya, and Diana Wilkin filed a *Notice of Completion of Briefing* [D.I. 66].

Dated: November 6, 2025

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ James E. O'Neill*

---

Richard M. Pachulski (admitted *pro hac vice*)

Alan J. Kornfeld (admitted *pro hac vice*)

James E. O'Neill (DE Bar No. 4042)

Tavi C. Flanagan (admitted *pro hac vice*)

919 N. Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: [rpachulski@pszjlaw.com](mailto:rpachulski@pszjlaw.com)

[akornfeld@pszjlaw.com](mailto:akornfeld@pszjlaw.com)

[joneill@pszjlaw.com](mailto:joneill@pszjlaw.com)

[tflanagan@pszjlaw.com](mailto:tflanagan@pszjlaw.com)

*Counsel to George L. Miller, Chapter 7 Trustee*